

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA §  
VS. § NO. 4:25-MJ-00404-2  
LIREN LAI §

## **MOTION TO SUBSTITUTE COUNSEL**

TO THE HONORABLE JUDGE PETER BRAY, UNITED STATES  
MAGISTRATE JUDGE FOR THE SOUTHERN DISTRICT OF TEXAS,  
HOUSTON DIVISION:

COMES NOW, LIREN LAI, Defendant in the above-entitled and numbered cause, and respectfully makes known to the Court that the Defendant desires to substitute Kent A. Schaffer, of 1001 McKinney Street, Suite 1600, Houston, Texas 77002, as his counsel in place of Matt Hennessy, of 700 Louisiana, Suite 2300, Houston, Texas 77002 in the above cause.

I.

This motion is not for the purpose of delay but in order that the record reflect Defendant's duly retained counsel of record and no injustice, prejudice, or obstruction of court procedure will be caused by the substitution.

WHEREFORE PREMISES CONSIDERED, the Defendant prays that this Honorable Court will grant this Motion and Order that Kent A. Schaffer be substituted for Matt Hennessy as Defendant's attorney of record in the above-entitled

and numbered cause.

Respectfully submitted,

/s/ Kent A. Schaffer

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Attorney for Defendant,  
LIREN LAI

APPROVED BY COUNSEL:

\*s/ Matt Hennessy

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\*SIGNED WITH PERMISSION

## **CERTIFICATE OF CONFERENCE**

Counsel for Defendant conferred with AUSA Jason Marchand concerning his position on Defendant's Motion to Substitute Counsel and he advised that he is unopposed to this motion.

*/s/ Kent A. Schaffer*  
KENT A. SCHAFFER

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2025, I electronically filed the foregoing Motion with the clerk of the court for the U.S. District Court, Southern District of Texas. I hereby certify that I have served the motion on all counsel and/or parties of record.

*/s/ Kent A. Schaffer*  
KENT A. SCHAFFER